

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143  
Honorable T.S. Ellis, III  
Trial: July 12, 2021

**MOTION TO SEAL DEFENDANT'S EXPERT REPORT**

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting the entirety of Dr. Whitney's expert report to be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS  
By Counsel

Respectfully submitted,

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/s/

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*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served this 18th day of June 2021, on all counsel of record.

/s/ Jonathan Jeffress  
Jonathan Jeffress